

**STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2008-196-E**

IN THE MATTER OF:

South Carolina Electric & Gas Company)	
Combined Application for Certificate)	PETITION FOR REHEARING OR
Of Environmental Compatibility and)	RECONSIDERATION BY JOSEPH
Public Convenience and Necessity and)	WOJCICKI –INTERVENOR <i>PER SE</i>
for a Base Load Review Order)	
)	

Notice is hereby given that Joseph Wojcicki, on behalf of himself as Per Se (Intervenor) in the above named case, hereby petitions the Commission for rehearing or reconsideration of Order No 2009-104(A) approving the Combined Application of SCE&G for the Construction and Operation of a Nuclear Facility in Jenkinsville, SC. The Order denies my Motion to Change the Location of the two New Reactors Planned by Applicant; Motion was dated November 10, 2009.

In support this Petition, Intervenor would respectively show that:

_ The SC Public Service Commission (PSC or Commission) erred in approving Jenkinsville location selected in 2005 that does not respect reality of large MW loads planned to be installed in the future, till 2024 (in less than 15 years) in the SC counties close to the Atlantic Ocean.

_ Specifically on Page 52 of the Order in Paragraph **a. Water Supply** PSC only accept old SCE&G statement about “normal water use during normal operation...which is approximately 83 cfs” ignoring the simple fact that using instead seawater there would be no necessity to draw water from Broad River which is so important source for SC Midlands and, of course, Great Columbia.

_ The Commission erred ignoring high risk of drought that was already noted by Nuclear Regulatory Commission (NRC) in the Southeast region-creating problem for existing 24 reactors in last years.

_ The Commission erred to include planned Duke Power/Energy reactors that will have no chances to use seawater when installed far away from the Atlantic Ocean.

_ The Commission erred completely in the matter of Electric Energy Generation and Distribution (SCE&G product and distribution network topology) even not requesting the necessary documentation in the Application. Its incomplete materials do not represent already known perspective large base (24/7) loads, e.g. Jasper Ocean Terminal approved by governors of GA and SC in 2007. Some of the embarrassing errors indicated at the hearing should indicate PSC a lack of at least professional verification and proof reading in the SCE&G team. Attached to the Order SCE&G exhibits still show slovenly typed electrical power and energy units. Not nice for Electric Company.

_ The Commission erred in Paragraph **b. Transmission** – Page 54-55. Misleading from SCE&G Application and lack of necessary technical documentation probably led to very wrong

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interpretation of numbers of lines and their length when comparing Jenkinsville and Atlantic Ocean Location. This is a case where SCE&G must add proper documentation so the rehearing could be ordered. The Commission erred denying Motion to Change Location which has solid scientific calculations and analysis. And nobody rebuttal it since November 10, 2008.

WHEREFORE for the foregoing reasons, I, Joseph "Joe" Wojcicki – intervenor in this case hereby urges the Commission to change the Order accepting Motion dated November 10, 2008, to request SCE&G to do rework of the Application to new location that will better serve SC industry, farmers and residents.

Respectfully submitted:

Joseph Wojcicki

820 East Steele Rd.
West Columbia, SC 29170

March 12, 2009

CERTIFICATE OF SERVICE

The copy of this Notice of Appeal is sent to:

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Or by Email Service to the parties named below:

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